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23 **UNITED STATES DISTRICT COURT**

24 **DISTRICT OF NEVADA**

25 Applications in Internet Time, LLC,

26 Plaintiff,

27 v.

28 Salesforce.com, Inc.

Defendant.

Case No. 3:13-CV-00628-RCJ-CLB

**AIT'S REQUEST FOR A STATUS
CONFERENCE UNDER L.R. 16-2**

25 Pursuant to L.R. 16-2, Plaintiff Applications in Internet Time, LLC ("AIT") respectfully
26 requests that the Court hold a status conference in view of the termination of *inter partes* review
27 ("IPR") proceedings involving the two patents at issue in this action.

28 This action has been stayed since June 14, 2016 pending IPR proceedings filed by RPX

1 Corporation (“RPX”) challenging the validity of the two patents at issue. (Dkt. #82.) However, the
 2 Court’s purpose for the stay disappeared when the Patent Trial and Appeal Board (“PTAB”)
 3 terminated the IPR proceedings (Dkt. #127, Ex. B), and further denied RPX’s request for rehearing
 4 of the termination decision (Dkt. #137, Ex. A). Notably, Salesforce’s only argument for maintaining
 5 or extending the stay was based on the theoretical possibility the PTAB could grant rehearing, a
 6 possibility that no longer exists. (See Dkt. #134.) Despite this, Salesforce has refused to engage in
 7 discovery or discussions concerning resumption of the action. As such, AIT respectfully requests a
 8 status conference for the parties to discuss with the Court the time and manner in which activity in
 9 this case should be restarted, including, e.g., the scheduling of a *Markman* hearing and the setting
 10 of a calendar for the completion of fact and expert discovery.

11 DATED: This 7th day of January 2021.

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CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of ROBISON, SHARP, SULLIVAN & BRUST, and that on this date I caused to be served a true copy of the attached **AIT'S REQUEST FOR A STATUS CONFERENCE UNDER L.R. 16-2** on all parties to this action by the method(s) indicated below:

by placing an original or true copy thereof in a sealed envelope, with sufficient postage affixed thereto, in the United States mail at Reno, Nevada, addressed to:

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by using the Court's CM/ECF Electronic Notification System.

DATED this 7th day of January, 2021.

/s/ Monica R. Wilmoth
Employee of Robison, Sharp, Sullivan & Brust